

1 GEORGE P. KELESIS, ESQ.  
2 Nevada Bar No. 000069  
3 COOK & KELESIS, LTD.  
4 517 South Ninth Street  
5 Las Vegas, Nevada 89101  
6 Phone: (702) 737-7702  
7 Fax: (702) 737-7712a  
8 E-mail: [gkelesis@bckltd.com](mailto:gkelesis@bckltd.com)

9 SUNETHRA MURALIDHARA  
10 Nevada State Bar No. 13549  
11 WRIGHT MARSH & LEVY  
12 300 S. Fourth St. Ste. 701  
13 Las Vegas, Nevada 89101  
14 Phone: (702) 382-4004  
15 E-mail: [smuralidhara@wmllawlv.com](mailto:smuralidhara@wmllawlv.com)  
16 *Attorneys for Mr. Raul Gil*

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,  
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17 Plaintiff,  
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19 v.  
20 RAUL GIL,  
21  
22 Defendant.

Case No.: 2:22-cr-00147-APG-EJY

**STIPULATION TO CONTINUE**  
**SENTENCING**  
**(Sixth Request)**

23 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United  
24 States Attorney, Thomas W. Flynn, Trial Attorney, Tax Division, as counsel for the United States of  
25 America, and George P. Kelesis and Sunethra Muralidhara, as counsel for the defendant, Raul Gil, that  
26 the sentencing in the above-captioned matter, currently scheduled for October 26, 2023 at 10:00 AM,  
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1 be vacated and continued to Thursday, January 4, 2024 at 1:30 P.M.<sup>1</sup>

2 This Stipulation is entered into for the following reasons:

3 1. Defendant is out of custody and does not object to the continuance.

4 2. The parties have reached an agreement in principal to modified joint  
5 recommendations for the sentencing of this matter, to incorporate newly available point reductions for  
6 first-time offenders and the resultant reduction in the sentencing guidelines, and are in the process of  
7 preparing formal documentation of that agreement for the Court's consideration.  
8

9 3. The parties also anticipate that their agreement will incorporate new material facts  
10 regarding restitution, as the Defendant has submitted payment of most of the gross restitution owed and  
11 anticipates payment of the remainder in the coming weeks.  
12

13 4. Defense counsel has a federal court trial in the matter of *USA v. Bradford*; Case No.  
14 2:19-CR-00222-KJD-BNW, which is scheduled to begin on or about October 16, 2023, and is estimated  
15 to last 4-6 weeks. Accordingly, Defendant's counsel will be unavailable to attend the sentencing in this  
16 matter on October 26, 2023.  
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18 5. Counsel for the Government also has a conflict with the October 26<sup>th</sup> sentencing  
19 due to a scheduled appearance in the Minnesota District Court.

20 6. Finally, the additional time will allow the parties to determine their positions  
21 regarding sentencing, gather and prepare support for their positions, file sentencing memoranda, and  
22 prepare for argument.  
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24 7. The additional time requested by this Stipulation is made in good faith and not for  
25 purposes of delay.  
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<sup>1</sup> Date and time provided by judicial staff and has been confirmed as available by all  
counsel.

This is the sixth request for continuation of the sentencing hearing.

DATED this 27th day of September 2023.

COOK & KELESIS,

By: /s/ George P. Kelesis  
GEORGE P. KELESIS, ESQ.  
Nevada Bar No. 000069  
*Counsel for Defendant Gil*

/s/ Sunethra Muralidhara  
SUNETHRA MURALIDHARA  
Nevada Bar No. 013549  
*Counsel for Defendant Gil*

*JASON M. FRIERSON*  
*UNITED STATES ATTORNEY*

By: /s/ Thomas W. Flynn  
*THOMAS W. FLYNN, Trial Attorney*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
  
Plaintiff,

Case No.: 2:22-cr-00147-APG-EJY

[PROPOSED]

v.

RAUL GIL,

**ORDER CONTINUING  
SENTENCING HEARING**

Defendant.

Based on the Stipulation of counsel and for good cause appearing, the Court hereby continues the sentencing of Defendant Raul Gil in this matter. The ends of justice served by granting said continuance outweigh the best interest of the public and the Defendant in a speedy sentencing because:

1. Defendant is out of custody and does not object to the continuance.
2. The parties have reached an agreement in principal to modified joint recommendations for the sentencing of this matter, to incorporate newly available point reductions for first-time offenders and the resultant reduction in the sentencing guidelines, and are in the process of preparing formal documentation of that agreement for the Court's consideration.
3. The parties also anticipate that their agreement will incorporate new material facts regarding restitution, as the Defendant has submitted payment of most of the gross restitution owed and anticipates payment of the remainder in the coming weeks.
4. Defense counsel has a federal court trial in the matter of USA v. Bradford; Case No. 2:19-CR-00222-KJD-BNW, which is scheduled to begin on or about October 16, 2023, and is estimated to

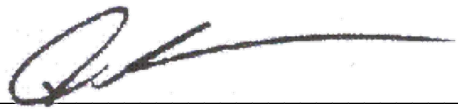
1 last 4-6 weeks. Accordingly, Defendant's counsel will be unavailable to attend the sentencing in this  
2 matter on October 26, 2023.

3 5. Counsel for the Government also has a conflict with the October 26th sentencing due to a  
4 scheduled appearance in the Minnesota District Court.  
5

6 6. Finally, the additional time will allow the parties to determine their positions regarding  
7 sentencing, gather and prepare support for their positions, file sentencing memoranda, and prepare for  
8 argument.

9 7. The additional time requested by this Stipulation is made in good faith and not for purposes  
10 of delay.  
11

12 IT IS THEREFORE ORDERED that the sentencing in the above-captioned matter, currently  
13 scheduled for October 26, 2023 at 10:00 AM is vacated and continued to January 4, 2024 at 1:30 P.M.  
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17 HONORABLE ANDREW P. GORDON  
18 UNITED STATES DISTRICT JUDGE

19 Dated: September 28, 2023  
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